

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

**GEOFFREY FERNALD,**

**Plaintiff,**

**v.**

**OPENAI, Inc.**

**Defendant.**

**C.A. No. 1:25-cv-00294-JJM-PAS**

**MOTION FOR EXTENSION OF TIME TO ANSWER  
OR OTHERWISE RESPOND TO THE COMPLAINT**

Defendant OpenAI, Inc., by and through its undersigned counsel, respectfully moves this Court for an order enlarging Defendant's time in which to answer or otherwise respond to the Complaint (Docket No. 1) by thirty (30) days, up to and including August 21, 2025 pursuant to Federal Rule of Civil Procedure 6(b). Based upon the date on which Plaintiff effected service of the Complaint, Defendant's answer is presently due on July 21, 2025. No prior request for an extension of time has been made in this action.

As Plaintiff made clear during a meet and confer call on July 7, 2025, and reiterated in his filing later that day (Docket No. 21), Plaintiff opposes any extension in this case. Nonetheless, good cause exists for the modest extension of time that Defendant requests. Defendant anticipates filing a Motion to Dismiss on the grounds that the Complaint fails to satisfy the requirements of 28 U.S.C. § 1915 or the applicable Federal Rules of Civil Procedure. This is complicated by the fact that the Complaint, and the filings and exhibits that seek to amend or correct the Complaint (Docket Nos. 1, 5, 10, 13), are difficult to parse or comprehend. For this reason, and to accommodate prior commitments of counsel, Defendant seeks a 30-day extension.

For the foregoing reasons, Defendant respectfully submits that good cause exists for the extension it seeks, and accordingly requests that the Court extend OpenAI's time to answer or otherwise respond to the Complaint to and including August 21, 2025.

Defendant,  
OPENAI, INC.  
By Its Attorneys,

/s/ Zachary A. Cunha  
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Dated: July 14, 2025

Sachli Balazadeh-Nayeri (*Pro Hac Vice*)  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on this 14<sup>th</sup> day of July, 2025, I electronically filed and served a copy of the within Motion for Extension of Time via the Court's Electronic Filing System to all parties registered and able to receive electronic filings in this matter and paper copies have been sent to those parties which are non-registered participants via first class mail, postage prepaid.

/s/ Zachary A. Cunha